

JOINT EXHIBIT LIST

No.	Description	Date	Bates or Dkt. No.	Objection	Response to Objection
1.	Email exchange between D. Hirsch and S. Banerjee re: Alkek & Williams v. Tuckerbrook	8/28– 29/2009	Dkt. No. 70-1		
2.	Deposition of Sumanta Banerjee in District of Mass. Matter.	7/21/2011	BANER-000231–426		
3.	Email exchange between S. Banerjee and Gandhi Banerjee re: (no subject)	6/28/2008	Dkt. No.19-10		
4.	Kolkata Municipal Licenses for ZBAC Enterprise for the years 2014-2019		BANER-000618 - 624		
5.	India Tax Return – Form No. 16	04/15/2010	BANER-000223-230		
6.	Unredacted Separation Agreement	6/19/2012	BANER-00482 - 490		
7.	S. Banerjee Executed Affidavit	12/18/2018			
8.	Status Conference Transcript	6/27/2012			
9.	Email exchange between S. Banerjee and John Hassett re: See Attached	7/22/2012 - 11/16/2012	Dkt. No. 9-3		
10.	S. Banerjee Requests Release of Lien	9/22/2014	Dkt. No. 55		

No.	Description	Date	Bates or Dkt. No.	Objection	Response to Objection
11.	Copies of IDs		BANER-000023		
12.	S. Banerjee Letter to Court	8/26/2016	Dkt. No. 71		
13.	Passport Stamps		BANER-000436 - 441		
14.	The Forbes Funds Advisory Board		Dkt. No. 57-3		
15.	Email to S. Banerjee re: Reminder Keep The Forbes Funds in the loop!	9/14/2014	BANER-000683 – 684		
16.	MIT Enterprise Forum Pittsburgh Executive Committee	7/26/2016	Dkt. No. 57-3		
17.	Schiff v. Banerjee Mechanics Lien	9/9/2014			
18.	Schiff v. Banerjee Docket	7/18/2016			
19.	Banerjee counterclaim against Schiff	11/13/2016			
20.	S. Banerjee Traffic Violation	4/17/2013			
21.	Magisterial District Judge Traffic Docket	9/15/2015			
22.	Magisterial District Judge Report	2/3/2016			
23.	Banerjee Counterclaim in Schiff v. Banerjee action	2/19/2015			
24.	Schiff v. Banerjee Docket	7/18/2016			

No.	Description	Date	Bates or Dkt. No.	Objection	Response to Objection
25.	S. Banerjee US Tax Return 2013		BANER-000432 - 432		
26.	Redacted Axis Bank Statement	10/12/2018	BANER 000004 - 13		
27.	Unredacted Axis Bank Statement	10/12/2018	BANER-000442 - 51		
28.	Unredacted Axis Bank Statement	12/19/2018	BANER 000102 – 122		
29.	Harvester Energy LLC Ohio State Certificate	9/17/2014			
30.	Banerjee's Motion to Set Aside Default Judgment	4/27/2016			
31.	Defendant's Response to Plaintiff's Motion in Opposition of Vacating or Setting Aside Default	8/10/2016	Dkt. No. 65		
32.	West Bengal Certificate of Registration	8/10/2016	Dkt. No. 65-1		
33.	Sumanta Banerjee Blue Book		BANER-000688		
34.	Pennsylvania Notice of Taxes owed for 2013	3/21/2017			
35.	Pennsylvania Notice of Taxes owed for 2014	4/14/2017			
36.	S. Banerjee Tax Return 2014	11/3/2018	BANER-000434-435		

No.	Description	Date	Bates or Dkt. No.	Objection	Response to Objection
37.	Pennsylvania Tax Return 2013	2/2/2018			
38.	Pennsylvania Tax Return 2014	2/2/2018			
39.	Evidence submitted by Robert Schiff civil action	7/11/2013			
40.	Answer and counterclaim from A. Banerjee in Schiff v. Banerjee Lawsuit	1/13/2015			
41.	Court verdict in Schiff v. Banerjee action	1/19/2016			
42.	Letter from Banerjee to the Court	8/16/2016			
43.	IRS Production of S. Banerjee 2016 Tax Returns	3/15/2019			
44.	A Banerjee's PNC Statement for Account No. 6179	10/12/2013	AB 00126 - 29		
45.	A Banerjee's 2014, Federal and State Tax returns	10/14/2018			
46.	AB and Sumanta Banerjee's PA Tax Return for 2015	10/14/2018			
47.	ABanerjee's PNC Statement for Account No. 6179	6/12/2014	AB 00149 - 153		
48.	Plaintiff's first set of Document Requests	8/3/2018			
49.	Banerjee Responses and Objections	10/8/2018			

No.	Description	Date	Bates or Dkt. No.	Objection	Response to Objection
50.	Email from R. Chan to B. Hutman re Discovery Response	1/23/2019			
51.	Email from R. Chan to B. Hutman re Trust info	2/9/2019			
52.	Transcript of court appearance	3/6/2019			
53.	Fidelity Authorization of 100K transfer	6/30/2004			
54.	Fidelity Account Information (July 2007)	7/2013			
55.	Fidelity Account Information	4/26/2011			
56.	Fidelity 401(k) Documents	2013			
57.	Fidelity Sole Account Statement	1/2013			
58.	Fidelity Joint Account Statement	1/2013 - 3/2013			
59.	Fidelity Sole Account Statement showing Tuckerbrook Asset	3/2013			
60.	Fidelity Sole Account Statement	10/2013			
61.	Fidelity Joint Account Statement	10/2013			
62.	Fidelity Sole Account Statement	11/2013			
63.	Fidelity Joint Account Statement	11/2013			
64.	Fidelity Sole Account Statement	1/2014			

No.	Description	Date	Bates or Dkt. No.	Objection	Response to Objection
65.	Fidelity Joint Account Statement	1/2014 - 3/2014			
66.	Fidelity Sole Account Statement	2/2014			
67.	Fidelity Sole Account Statement	5/2014			
68.	Fidelity Withdrawal from IRA 9.5K	5/16/2014			
69.	Fidelity Sole Account Statement	12/2014			
70.	Affidavit of Service	11/12/2013			
71.	Property records for A. Banerjee Parents	3/28/2019			
72.	Affidavit of S. Banerjee	4/2019			
73.	Email from Zbac LLC to Trustee	1/28/2019			
74.	Deposition Transcript of Sumanta Banerjee	2/14/2019			
75.	Zbac, LLC Certificate Copies	6/23/2017			
76.	Resignation Letter of S. Banerjee from Zbac, LLC	6/19/2012	BANER 000003		
77.	Reba Banerjee Affidavit	2/10/2014	Dkt. No. 57-3		
78.	Mailing Envelopes for Banerjee filings	8/8/2016	Dkt. No. 65-2		
79.	Banerjee Letter to Court	10/6/2016	Dkt. No. 74		
80.	Pennsylvania Tax Lien	3/23/2018			
81.	Pennsylvania Taxpayer Information Sheet	3/12/2018			

No.	Description	Date	Bates or Dkt. No.	Objection	Response to Objection
82.	Court verdict in favor of Schiff	1/19/2016			
83.	A. Banerjee Responses and Objections to Subpoena	1/25/2019			
84.	A. Gandhi affidavit executed	12/17/2018			
85.	Sheriff Return for Schiff Collection	1/23/2019			
86.	A. Banerjee Executed Affidavit	12/18/2018			
87.	A. Banerjee Deposition Transcript	3/29/2019			
88.	Schedule E to Banerjee's 2014 Federal Tax Return				
89.	Form 4684 to Banerjee's 2014 Federal Tax Return				
90.	2014 Form 5498 Banerjee's IRA Contribution Info.				
91.	Email from AB to Walter Jack attaching K-1s	10/2/2017			
92.	Email exchange between AB and Walter Jack re: extension on tax returns	3/11– 4/2/2018			
93.	Email from Walter Jack to AB attaching the first two pages of Banerjee's 2014 Federal Return	11/2/2018			

No.	Description	Date	Bates or Dkt. No.	Objection	Response to Objection
94.	Email from AB responding "Perfect" to the previous exhibit wherein she asked for a tax return with Banerjee's Indian address.	11/3/2018			
95.	Email from AB to Walter Jack attaching 2017 K-1s	11/20/2018		Defendant objects since HRB permission to provide taxes (as agreed to by Mr. Hutman) only extended to 2016 and not 2017. So this is not valid and cannot be used by Plaintiff. Regardless, Defendant has no interest in SSA Capital since it belongs to Mrs. Banerjee solely. All K1s for SSA belong to Mrs Banerjee solely.	K-1 shows Defendant's interest in US entity that he maintained throughout the relevant time period
96.	Email from AB to Walter Jack copying "Hubby"	11/23/2018			
97.	Email exchange between AB and Walter Jack re: carrying over 2015 expenses to subsequent years	1/4/2019			

No.	Description	Date	Bates or Dkt. No.	Objection	Response to Objection
98.	Email from AB to Walter Jack attaching 2017 SSA Capital Partners P & L	1/8/2019		Defendant objects since HRB permission to produce taxes (as agreed to by Mr. Hutman) only extended to 2016 and not 2017. So this is not valid and cannot be used by Plaintiff. Regardless, Defendant has no interest in SSA Capital since it belongs to Mrs. Banerjee solely. All K1s for SSA belong to Mrs Banerjee solely.	Document will be used to impeach Defendant's claim not to have an interest in a US entity.
99.	PAN card – Government tax authority issued and Indian Driver license	Jan 2009		Plaintiff objects that the listed “date” is not show in any of the documents.	Employers in India will not pay you without a PAN card.
100.	Lease of Weston House	July 4, 2013- June 30, 2014			
101.	Driver receipts of Banerjee	2010-2015			

No.	Description	Date	Bates or Dkt. No.	Objection	Response to Objection
102.	Banerjee children school records/proof of attendance	2009-2011			
103.	Ration Card of Banerjee-given to all Indian residents	1995			
104.	Various documents related to ownership of Houses in CT, PA	2009-2015			
105.	A. Gandhi affidavit	2020		Plaintiff objects to any new affidavit from an out-of-Court witness. The affidavit is hearsay, was not produced in discovery, and was not provided to Plaintiff until 2/25/2020	Defendant understood from last Status Hearing on October 23 that Final Exhibit list is due before Hearing i.e. Feb 25th as Ordered by the Hon. Court and Affidavits (page 7/8 of Transcript) could be used. Defendant is Pro Se and may have misunderstood and would ask for Courts understanding and permission to use them.

No.	Description	Date	Bates or Dkt. No.	Objection	Response to Objection
106.	HRB documents for PA state tax appeal	02/2019		Plaintiff objects to portions of this document as never previously produced.	Defendant thought that these would be produced under the subpoena to HRB- so we are producing as it seems that they were not produced despite the subpoena. We hope Court would allow this evidence since it should have been produced and defendant was not aware it was not. Also, based on Transcript from Status Conference (10/23) and page 7/8, Final Exhibits are due today. As Pro Se, that was my interpretation.
107.	OCI (overseas citizen of India) card	12/23/2008			
108.	R. Banerjee Affidavit	2020		Plaintiff objects to any new affidavit from an out-of-Court	Defendant understood from last Status Hearing

No.	Description	Date	Bates or Dkt. No.	Objection	Response to Objection
				witness. The affidavit is hearsay and was not produced in discovery, and was not provided to Plaintiff until 2/25/2020	on October 23 that Final Exhibit list is due before Hearing i.e. Feb 25th as Ordered by the Hon. Court and Affidavits (page 7/8 of Transcript) could be used. Defendant is Pro Se and may have misunderstood and would ask for Courts understanding and permission to use them.
109.	Emails related to Tollygunje Club membership in India	2010			
110.	India Car registration Insurance	2010			
111.	Emails from USPS re: mail forwarding in 2009 & 2010	2009		Plaintiff objects to this document as never previously produced.	These were provided to prior counsels.
112.	Emails related to cell phone bills in India	2009			

No.	Description	Date	Bates or Dkt. No.	Objection	Response to Objection
113.	Corporation Tax for entities that Banerjee created	2009, 2015			
114.	Passbook of Indian bank account	2009		Plaintiff objects to this document. A readable, unredacted version was never produced in discovery. Additionally, the date in the document show the account open date as 5/11/2012 and the entries run into 2016. Finally, the document is incomplete.	This is the only copy Defendant has. It was produced to counsel previously, Was not previously objected to.
115.	Car Loan that Banerjee took out in 2010	2010			
116.	Indian Form 16 and Form 16a (tax form equivalent to the w2)	2009-2011			
117.	Car registration and insurance in India	6/19/2012-9/18/2012			
118.	Life insurance policy in India	2009			
119.	Notice of Electronic filing in Dist. of Mass. showing Indian address	2014			
120.	Ohio registration for Harvester Energy LLC	2014			

No.	Description	Date	Bates or Dkt. No.	Objection	Response to Objection
121.	Library membership information	2010			
122.	Paying guest Leases	2011-2015			
123.	Withdrawn				
124.	A Banerjee W2s	2013-2015			
125.	Addendum to the Separation Agreement	9/20/2012		Plaintiff objects to this document as never previously produced. Nor was it existence mentioned in any prior deposition or conference.	It was mentioned in deposition and the document existed in India and was retrieved when Defendant went to India recently. Also, this is the Final Exhibit list as per Page 7/8 of Transcript of Status Conference on 10/23.

The parties reserve their right to introduce documents not listed above for the purpose of impeachment or rebuttal.

Jointly submitted,

By: /s/ Ben Hutman

Ben Hutman
SADIS & GOLDBERG, LLP
551 5th Avenue, 21st Floor
New York, New York 10176
(212) 573-6675
Counsel for Plaintiff

By: /s/ Sumanta Banerjee

Sumanta Banerjee
Pro Se
1514 Cook School Rd.
Pittsburgh, PA 15241
(203) 501-0797
Defendant